

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO: WAVE 4 CASES ON ATTACHED EXHIBIT A	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE OR, IN THE ALTERNATIVE, TO
LIMIT THE OPINIONS AND TESTIMONY OF OLGA RAMM, M.D.**

COMES NOW Plaintiffs in actions listed on attached Exhibit A, by and through the undersigned attorneys, and files this Plaintiffs' *Daubert* Motion to Exclude or, In The Alternative, To Limit The Opinions And Testimony Of Olga Ramm, M.D. and would respectfully show the Court that Dr. Ramm should be excluded for the following reasons:

1. Dr. Ramm is not qualified to offer general opinions on the design or warnings for the TVT mesh device, based on Dr. Ramm's lack of experience, training and education related to warnings and materials engineering, along with Dr. Ramm's own admission that her warnings opinions are offered without proper review of the materials.
2. In support of this motion, Plaintiff has submitted a memorandum of law and also relies upon the following attached exhibits:
 1. A true copy of the Wave 4 TVT Expert Report of Olga Ramm, M.D. is attached hereto as Exhibit B.
 2. A true copy of the Curriculum Vitae of Olga Ramm, M.D. is attached hereto as Exhibit C.

3. A true copy of excerpts from the Deposition of Dr. Olga Ramm dated March 17, 2017 is attached hereto as Exhibit D.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully request that the Court grant their *Daubert* Motion to Exclude or, In The Alternative, To Limit The Opinions And Testimony Of Olga Ramm, M.D. Additionally, Plaintiffs request all other and further relief to which they may be justly entitled.

Dated: April 13, 2017

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I filed the foregoing document on April 13, 2017, using the Court's CM-ECF filing system, thereby sending notice of the filing to all counsel of record in this matter.

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